

EXHIBIT 5

Declaration of Gina D. Coggin

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
MIDDLE DIVISION**

WILLIAM C. MILES, SR.,)	
)	
Plaintiff,)	
)	CIVIL ACTION NO.
V.)	4:19-CV-00756-CLM
)	
WAL MART ASSOCIATES, INC.,)	
WAL MART STORES EAST, LP,)	
)	
Defendant.)	

**DECLARATION OF GINA COGGIN IN SUPPORT OF PETITION FOR
THE AWARD OF ATTORNEY'S FEES AND COSTS**

1. My name is Gina D. Coggin. I submit this declaration in support of Plaintiff's Petition for Attorney Fees in *William C. Miles, Sr. v. Walmart Associates, Inc.* Civil Action No. 4:19-cv-00756-CLM. This declaration is based on personal knowledge and on business records maintained by me in the ordinary course of business at the law firm where I am Of Counsel, Haynes & Haynes, P.C. I am an adult resident of this judicial district and division and have personal knowledge of the matters set forth herein.

2. I earned my Juris Doctor degree from Cumberland School of Law, in 1993. I was awarded a Bachelor of Arts degree from University of Alabama in

1990.

3. I am an attorney licensed to practice law in Alabama. I have been licensed to practice in Alabama since 1993. I have been admitted to and represented clients in the Supreme Court of the United States, United States Court of Appeals for the Eleventh Circuit. I have appeared in the United States District Courts for the Northern, Middle, and Southern Districts of Alabama.

4. My entire practice has been on behalf of individuals or organizations seeking to secure equal treatment under the laws of the United States.

5. Based upon this information, the partners of Haynes & Haynes, P.C. and I determined, that a rate of \$375 per hour is reasonable.

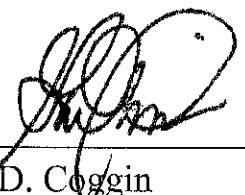
6. An hour-by-hour, detailed list of the time I have devoted to this case is filed as Exhibit A.

7. I reviewed each of the entries contained on Exhibit A, entry-by-entry, to determine whether the entry should be reduced or red-lined from my fee petition. In that process, I did not identify any entries which, in my opinion, could be classified as excessive, redundant, or unnecessary under the applicable legal authority.

8. I believe that the hours identified on Exhibit A were necessary, reasonable and not excessive for a case of this complexity and detail. The number of hours on Exhibit A reflect the number of hours which I would have billed a paying client who was compensating me on an hourly basis for work performed on this case. I believe these hours are reasonable and fairly includable in a fee award pursuant to Title VII.

I have read the above and declare that it is true and correct to the best of my knowledge.

Date: September 29, 2021



Gina D. Coggin

OF COUNSEL:

THE COGGIN FIRM, LLC

222 South 8th Street

Gadsden, AL 35901

(256) 485-0909

September 29, 2021

William Miles v. Walmart

BILLABLE TIME:

04/29/15	Initial consult w client; reviewed documentation	1 hr
04/30/15	Received and reviewed email from client	.25
07/15/15	Phone Conference with client	.25
07/15/15	Dictated and Filed EEOC Charge	1 hr
07/20/15	Received and reviewed EEOC Charge from EEOC	.25
12/10/15	Phone Conference with Client	.25
02/17/16	Phone Conference with Client	.25
07/18/16	Phone Conference with Client	.25
09/06/16	Received and reviewed letter from EEOC	.30



11/11/16	Phone Conference with Client	.20
11/18/16	Received and reviewed email from Debra Powell with EEOC	.20
11/29/16	Email to Debra Powell with EEOC	.20
02/07/17	Received and reviewed email from Debra Powell with EEOC	.20
02/17/17	Phone Conference with Client; Email to Debra Powell with EEOC	.25
04/21/17	Called and talked with Lashaunda Love with EEOC regarding claim	.20
01/31/18	Talked with the EEOC regarding issuing the right to sue letter	.25
06/14/18	Received and reviewed email from Lashaunda Love with EEOC	.20
11/09/18	Talked with Michael Cochran with EEOC regarding claim	.20
11/12/18	Phone Conference with Client; Emailed Michael Cochran with EEOC regarding claim	.30
12/06/18	Received and review determination Letter from EEOC	.30
12/07/18	Received and reviewed email from EEOC	.20
12/12/18	Received and reviewed email from Michael Cochran with EEOC	.20

12/19/18	Phone Conference with Client	.25
12/20/18	Received and reviewed email from Michael Cochran with EEOC; Phone Conference with Michael Cochran from EEOC regarding claim	.30
02/21/19	Received and reviewed letter from EEOC	.20
3/12/19	Email Kenny Haynes regarding referral of EEOC claim	.15
04/03/19	Office meeting with Kenny Haynes	1 hr
	Total Billable Time	8.60